

VIA ELECTRONIC FILING

April 27, 2012

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Ex Parte: CG Docket 03-123 and 10-51

Dear Ms. Dortch:

On April 26, 2012, Robin Horwitz, CEO; Jewel Jauregui, Director of Call Center Operations; and David Bahar, Vice President of Government and Regulatory Affairs, all of Convo Communications, LLC ("Convo"), participated in a phone conference with Sean Lev, Deputy General Counsel, in regards to the *Further Notice of Proposed Rulemaking* ("FNPRM") released by the Commission on December 15, 2011 (CG Dockets 03-123 and 10-51).

During the phone conference, Convo discussed its FNPRM filings with Mr. Lev and encouraged focus on areas in the FNPRM that would bring immediate benefit to the VRS user community, such as the broadband pilot program and related efforts to increase the penetration of VRS in the deaf community. Convo also encouraged focus on areas of potential waste, such as ten-digit telephone numbers ("TDNs") that continue to receive inbound voice calls even after the number is inactive as demonstrated by extended periods of inactivity by the user owning the TDN.

Convo also expressed concern that implementing a per-user reimbursement mechanism without extended study as to its potential affect on the VRS program would be inadvisable, and that the Commission should evaluate whether its recent efforts to reform VRS have had the intended effect before making a determination about whether, and how, to proceed with a per-user reimbursement mechanism.

Finally, Convo discussed with Mr. Lev its opinion that a single unitary rate, whether based on minutes or users, would subsidize a monopoly, while a two- or three-tier rate would subsidize competition and accordingly enhance service quality, product quality, and have a positive effect on users' VRS experiences.

David J. Bahar



Vice President of Government and Regulatory Affairs
Convo Communications, LLC